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Attorneys for Plaintiffs

L.C., I.H., A.L., and Antonia Salas Ubaldo

**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her guardian *ad litem* Maria Cadena, individually and as successor-in-interest to Hector Puga; I.H., a minor by and through his guardian *ad litem* Jasmine Hernandez, individually and as successor-in-interest to Hector Puga; A.L., a minor by and through her guardian *ad litem* Lydia Lopez, individually and as successor-in-interest to Hector Puga; and ANTONIA SALAS UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY OF SAN BERNARDINO; S.S.C., a nominal defendant; ISAIAH KEE; MICHAEL BLACKWOOD; BERNARDO RUBALCAVA; ROBERT VACCARI; JAKE ADAMS; and DOES 6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

Honorable Kenly Kiya Kato

**DECLARATION OF HANG D. LE IN
SUPPORT OF PLAINTIFFS'
OPPOSITION TO COUNTY
DEFENDANTS' EX PARTE
APPLICATION FOR ONE
ADDITIONAL MOTION IN LIMINE**

1 I, Hang D. Le, hereby declare as follows:

2 1. I am an attorney duly licensed to practice law in the United States
3 District Court for the Central District of California. I make this Declaration in
4 Support of Plaintiffs' Opposition to County Defendants' Ex Parte Application for
5 One Additional Motion in Limine. I have personally familiar with the matters stated
6 herein and could testify competently thereto if called.

7 2. Attached hereto as "**Exhibit 1**" is a true and correct copy of the January
8 17, 2025 Notice of Taking of Deposition of Sal (Last Name Unknown), scheduled
9 for January 30, 2025.

10 3. Attached hereto as "**Exhibit 2**" is a true and correct copy of the January
11 21, 2025 Amended Notice of Taking of Deposition of Salvador Navarro Gurrola,
12 scheduled for January 30, 2025.

13 4. Attached hereto as "**Exhibit 3**" is a true and correct copy of the April 7,
14 2025 email correspondence from State Defendants' counsel regarding State
15 Defendants' contemplated motions in limine.


16 5. Attached hereto as "**Exhibit 4**" is a true and correct copy of the April 7,
17 2025 email correspondence from County Defendants' counsel regarding County
18 Defendants' contemplated motions in limine.

19 6. On April 11, 2025, the parties held a meet and confer regarding
20 contemplated motions in limine, which I participated in on behalf of Plaintiffs.
21 During this meeting, I indicated that there were several issues from Defendants' list
22 of motions in limine that could not be resolved one way or the other at the meeting,
23 including: (1) limiting photos of Mr. Puga's body and autopsy photos, of which
24 Plaintiffs believed could be resolved in Plaintiffs proposing a select number of
25 photos during the parties' exchange of exhibit list; (2) excluding evidence of
26 Antonia Salas Ubaldo's wrongful death damages, of which I would needed to get
27 authority from Plaintiffs; and (3) excluding the black-and-white "Sal" surveillance
28

1 video, of which I needed to discuss with Plaintiffs' lead trial counsel, Dale K.
2 Galipo.

3 7. Subsequently, when the parties exchanged exhibit lists on April 14,
4 2025, I provided further updates and clarification on the outstanding issues from the
5 meet and confer, including Plaintiffs' unwillingness to stipulate to excluding the
6 black-and-white surveillance video. Attached hereto as "**Exhibit 5**" is a true and
7 correct copy of the April 14, 2025 email correspondence regarding Plaintiffs'
8 exhibit list and Plaintiffs' stance on the outstanding issues from the parties' April
9 11, 2025 meet and confer.

10
11
12 I declare under penalty of perjury under the laws of the State of California and the
13 United States of America that the foregoing is true and correct. Executed this 18th
14 day of April 2025, in Los Angeles, California.

15
16 
17 _____
18 Hang D. Le